

The valuation of the Property is a central issue in this case. The current assessed value of the Property by the Town of Westborough is \$1,813,300, which reflects a sharp decline from previous years. There are also significant discrepancies between the assessed value and recent comparable sales in the area. These discrepancies raise serious concerns about the accuracy and fairness of the proposed settlement.

C. Need for an Impartial and Accurate Valuation:

Given the importance of the Property's valuation to the resolution of this case, it is crucial that the Court has access to an impartial and accurate appraisal conducted by a qualified expert. A court-appointed expert would provide the necessary expertise to determine the fair market value of the Property, ensuring that the interests of all parties, including Movant, are adequately protected.

IV. REQUEST FOR RELIEF

For the reasons set forth above, Movant respectfully requests that this Court appoint a qualified expert to conduct an independent appraisal of the Property at 231 Turnpike Road, Westborough, MA. Movant further requests that the costs associated with the court-appointed expert be allocated as the Court deems appropriate, considering Movant's financial hardship.

V. CONCLUSION

In light of the significant impact that the Property's valuation will have on the outcome of this case, the appointment of a court-appointed expert is both necessary and appropriate. Movant respectfully requests that the Court grant this motion and appoint an independent expert to conduct an impartial appraisal of the Property.

DATED: August 27, 2024, Respectfully submitted:

By creditor,



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CERTIFICATE OF SERVICE

I, Lolonyon Akouete, hereby certify that the above document is served by email and mailing a copy of the same, first-class mail, to the following:

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